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11 *Counsel for Movant the Twitter Investor Group*

12 **UNITED STATES DISTRICT COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 KHAN M. HASAN, Individually and on
behalf of all others similarly situated,

17 Plaintiff,

18 vs.

19 TWITTER, INC., JACK DORSEY, and
20 NED SEGAL,

21 Defendants.

No. 4:19-cv-07149-YGR

**NOTICE THAT THE MOTION OF THE
TWITTER INVESTOR GROUP FOR
CONSOLIDATION OF THE RELATED
ACTIONS, APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF CO-
LEAD COUNSEL IS UNOPPOSED**

Judge: Hon. Yvonne Gonzalez Rogers
Courtroom: 1-4th Floor
Date: February 4, 2020
Time: 2:00 p.m.

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24 *[Additional Caption Below]*
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1 KHAFRE BARCLIFT, Individually and on
2 behalf of all others similarly situated,

3 Plaintiff,

4 vs.

5 TWITTER, INC., JACK DORSEY, and
6 NED SEGAL,

7 Defendants.
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No. 4:19-cv-07992-YGR

1 Movant Twitter Investor Group¹ (the “Twitter Investor Group” or “Movant”) respectfully
 2 submits this Notice of Non-Opposition to its pending motion for consolidation of the above-captioned
 3 related actions, appointment as lead plaintiff, and approval of its selection of Kaplan Fox & Kilsheimer
 4 LLP (“Kaplan Fox”) and Levi & Korsinsky, LLP (“Levi & Korsinsky”) as co-lead counsel in the
 5 consolidated action (the “Motion”). ECF No. 31.

6 Pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), any party seeking
 7 appointment as lead plaintiff in the above-captioned actions was required to file a related complaint or
 8 move this Court on or before December 30, 2019. On December 30, 2019, the Twitter Investor Group
 9 timely filed its Motion and papers in support of consolidation, appointment as lead plaintiff, and
 10 approval of its selection of co-lead counsel. *See* ECF No. 31. Two other movants, Hakam Altohol
 11 (“Altohol”) and the Weston Family Partnership LLLP (“Weston Family Partnership”) also filed
 12 motions for appointment as lead plaintiff. *See* ECF Nos. 26 and 28, respectively. Subsequently,
 13 Weston Family Partnership withdrew its motion for lead plaintiff on January 8, 2020, stating that it
 14 “does not appear to have the largest financial interest in this litigation.” ECF No. 35. Similarly, on
 15 January 10, 2020, Altohol withdrew his motion for plaintiff, stating, “Based upon a review of the
 16 motions and supporting documentation provided by the other movants seeking appointment as Lead
 17 Plaintiff, it appears that Altohol does not possess the ‘largest financial interest in the relief sought by the
 18 class,’ as required by the Private Securities Litigation Reform Act of 1995. 15 U.S.C. § 78u-
 19 4(a)(3)(B)(iii)(I)(bb).” ECF No. 36. Therefore, the Twitter Investor Group’s Motion is unopposed.

20 Based on the facts presented above and the factual, legal, and financial reasons presented in its
 21 Motion and supporting papers, the Twitter Investor Group respectfully requests that the Court issue an
 22 Order pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-
 23 4(a)(3)(B), as amended by the PSLRA: (1) consolidating the above-captioned actions pursuant to
 24 Rule 42(a);² (2) appointing it as lead plaintiff on behalf of a putative class of all persons or entities that

25 _____
 26 ¹ The Twitter Investor Group collectively refers to: Thomas Do, Michael J. Conroy, and Richard Slepko.

27 ² The Twitter Investor Group, Weston Family Partnership, and Altohol each moved the Court to
 28 consolidate the related actions. Defendants, as of the date of filing, have not taken a position on the
 issue of consolidation. As the related cases involve substantially similar issues of law and fact, they
 should be consolidated for all purposes.

transacted in Twitter, Inc. securities between August 6, 2019 and October 23, 2019, inclusive; (3) approving Movant's selection of Kaplan Fox and Levi & Korsinsky as Co-Lead Counsel; and (4) granting such other relief as the Court may deem just and proper.

Dated: January 13, 2020

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

By: /s/ Laurence D. King

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Dated: January 13, 2020

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)

I, Laurence D. King, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13th day of January 2020, at Oakland, California.

By: /s/ Laurence D. King
Laurence D. King